

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED FORTY-SECOND OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR
WHICH THE COMMONWEALTH IS NOT LIABLE

Upon the *Five Hundred Forty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for which the Commonwealth is Not Liable* (the “Five Hundred Forty-Second Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth”), dated October 28, 2022, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Five Hundred Forty-Second Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-Second Omnibus Objection and to grant the relief requested

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Forty-Second Omnibus Objection.

therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Forty-Second Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Forty-Second Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Five Hundred Forty-Second Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-Second Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Forty-Second Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22746 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-Second Omnibus Objection

Five Hundred Forty-Second Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALTAMENTE GS, LLC TU BUFETE LEGAL ENID D. FLORES, ESQ. METRO OFFICE PARK 7 CALLE 1 SUITE 204 GUAYNABO, PR 00969	04/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7020	\$18,270.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
2	ARENAS BUS LINE, INC. RR 01 BOX 3405 CIDRA, PR 00739	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	54296	\$355,702.12
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
3	C E & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960	05/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11889	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
4	CARIBBEAN ASSET MANAGEMENT & FUNDING INTIMA, INC. ANGEL L. ACEVEDO ESQ. URB PASEO ALTO 68 CALLE 2 SAN JUAN, PR 00926-5918	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27906	\$45,395.30
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$20,310.12 in the agency's system. Claim #27906 also contained on Exhibit A to the 372nd Omnibus Claims Objection for Claims to Be Modified.						

Five Hundred Forty-Second Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	COMMUNICATION LEASING LEASING CORPORATION ANA ALBERTORIO PO BOX 362526 SAN JUAN, PR 00936-2565	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29416	\$23,445.51
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
6	HR BUS LINE INC. PO BOX 1958 LAS PIEDRAS, PR 00771	06/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	49442	\$96,326.87
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
7	INTELUTIONS, INC. PMB 367 35 CALLE JUAN BORBON SUITE 67 GUAYNABO, PR 00969	05/02/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9295	\$98,858.50
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice totaling \$32,940.00 in the agency's system. Additionally proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$65,918.50 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
8	MARQUEZ CRUZ, JORGE PMB 131 CALLE SIERRA MORENA 267 SAN JUAN, PR 00926	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35307	\$362,532.42
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
					TOTAL	\$1,000,530.72*